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SEP 1 7 2007

Phone 253,752,2185 Fax: [253,752,7083

5219 N. Shirley St., Suite 100 Tacoma, WA 98407

September 14, 2007

Mr. Kevin L. Rochlin Remedial Project Manager U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue, ECL-111 Seattle, WA 98101

RE:

Monthly Report: No. 135, August 2007

Operable Unit No. 02

Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill Site Manager

Attachment (4 copies)

cc:

Chung Ki Yee - Washington Department of Ecology

Evan Griffiths - CH2MHill (2 copies)

Richard Kauffman - ATSDR c/o U.S. EPA Region 10

Leslie Ann Rose - Citizens for a Healthy Bay



Monthly Report No. 135, August 2007 Operable Unit 02 Asarco Tacoma Smelter Site

- A. Actions taken to achieve compliance with the Consent Decree during the previous month.
 - 1. A regular monthly design review meeting was not held in August.
 - 2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
 - 3. Remedial Action activities continued.
- B. Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.
 - 1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Point Ruston in July are attached. There was no exceedance of the interim discharge limits.

- 2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,650 gallons of leachate (4.5 ppm results attached) on August 23, 2007.
- 3. Point Ruston completes air monitoring at the perimeter of Stack Hill during stack base demo operations. Results of samples collected from July 23rd through August 16th are attached. There were no exceedances.
- C. Work Plans and other deliverables completed and submitted during the previous month.
 - 1. No comments were received from EPA during the month of August.

Monthly Report No. 135, August 2007 Operable Unit 02 Asarco Tacoma Smelter Site

- 2. Remedial Action during August included the following tasks:
 - OCF construction activities:
 - ➤ Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
 - Stack Hill construction activities:
 - Maintained erosion and surface water controls
 - > Completed post-remediation sampling by lot and preparation of post-remediation maps
 - > Air monitoring
 - Site Capping construction activities:
 - > Continued concrete sorting and sizing
 - > Placed residential soils and Stack Hill soils as subgrade
 - Maintained erosion and surface water controls
 - Site-wide remediation activities:
 - > Continued surface water controls
 - > Maintained haul roads and stockpiles onsite
- D. Actions scheduled for the next six weeks.
 - 1. Point Ruston anticipates receiving comments from EPA on the Construction Management Plan, Construction Quality Assurance Plan and Performance Standards Verification Plan submitted to EPA on June 22nd.
 - 2. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - > Outfall sampling (weekly composite samples) during scheduled months
 - OCF construction activities:
 - > Continue collection of leachate for offsite disposal
 - > Continue monitoring of leachate volumes
 - Stack Hill construction activities:
 - > Erosion controls and site maintenance
 - Site Capping construction activities:
 - > Continue to place subgrade at the site
 - > Sort concrete and place residential soils on lower site.
 - Site-wide construction activities:
 - > Continue surface water controls
 - > Maintain roads and stockpiles onsite
- E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.
 - 1. Point Ruston Remediation Design is under revision based on comments from EPA.

Monthly Report No. 135, August 2007 Operable Unit 02 Asarco Tacoma Smelter Site

- F. Modifications to work plans or schedules proposed to or approved by EPA.
 - 1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.
- G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.
 - 1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1st and 3rd Monday of each month).
 - 2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
 - 3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
 - 4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of August 2007 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.034	6.80%	0.000	0.00%	0.000	0.00%
North Outfall	0.049	9.80%	0.048	9.50%	0.008	1.50%

 $^{^{\}star}\,$ 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW. Non-detect = 0.000



Client:

Point Ruston LLC

Project:

Tacoma Smelter OCF Leachate

Lab ID:

B07081004-001

Client Sample ID: TSM080709

Report Date: 08/14/07

Collection Date: 08/09/07 12:30

DateReceived: 08/10/07

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL Arsenic	4.5	mg/L		0.1		E200.7	08/13/07 19:39 / rlh

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AUG 1 6 2007

08/14/2007

Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:
Spectra Project:

07/31/2007 2007070428

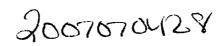
Client ID_	Spectra #	Analyte	Result	<u>Units</u>	Method	Matrix	Date Sampled
072307-181	1	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	
072307-333	2	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/23/2007
072307-719	3	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/23/2007
072407-181	4	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/24/2007
072407-719	5	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/24/2007
072407-333	6	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/24/2007
072507-181	7	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/25/2007
072507-333	8	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/25/2007
072507-719	9	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/25/2007
072607-181	10	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/26/2007
072607-719	11	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/26/2007
072607-333	12	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/26/2007

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager a8/scj

Page 1 of 1

CHAIN OF CUSTODY RECORD





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AUG 1 6 2007

08/14/2007

Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:
Spectra Project:

08/06/2007 2007080077

				-			Date
Client ID	Spectra #	<u>Analyte</u>	Result	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	Sampled
073007-181	1	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/30/2007
073007-719	2	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/30/2007
073007-333	3	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/30/2007
073107-181	4	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/31/2007
073107-719	5	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/31/2007
073107-333	6	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	07/31/2007
080107-181	7	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/01/2007
080107-719	8	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/01/2007
080107-333	9	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/01/2007
080207-181	10	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/02/2007
080207-719	11	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/02/2007
080207-333	12	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/02/2007
080307-181	13	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/03/2007
080307-719	14	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/03/2007

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Steve Hibbs, Laboratory Manager

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Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:

08/06/2007

Spectra Project:

2007080077

Client ID	Spectra #	Analyte	Result	Units	Method	Matrix	Date Sampled
080307-333	15	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/03/2007

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Steve Hibbs, Laboratory Manager a8/scj

Page 2 of 2

2007020077

POINT RUSTON

CHAIN OF CUSTODY RECORD

5219 N. Shirley St., Suite 100 Tacoma, WA 98407 Phone: 253-752-2185 Fax: 253-752-7083

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AUG 3 0 2007

08/27/2007

Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:

08/16/2007

Spectra Project:

2007080246

	•					. I	Date
Client ID	Spectra #	Analyte	Result	<u>Units</u>	Method	<u>Matrix</u> Sa	mpled
080607-181	1	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	6/2007
080607-719	2	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	6/2007
080607-333	3	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	6/2007
080707-181	4	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	7/2007
080707-719	5	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	7/2007
080707-333	6	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	7/2007
080807-181	7	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	8/2007
080807-719	8	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	8/2007
080807-333	9	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	8/2007
080907-181	10	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	9/2007
080907-333	11	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	9/2007
080907-719	12	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/0	9/2007
081007-181	13	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/1	0/2007
081007-719	14	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette 08/1	0/2007

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Steve Hibbs, Laboratory Manager a8/scj

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08/27/2007

Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:

08/16/2007

Spectra Project:

2007080246

Client ID	Spectra #	Analyte	Result	Units	Method	Matrix	Date Sampled
081007-333	15	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/10/2007

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager a8/scj

Page 2 of 2

CHAIN OF CUSTODY RECORD



PROJ. NO			PRC	MECI	NAME			_			/	/		/	/	/	/	
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RUSTO

Fax: 253-752-2185

RUSTON

5219 N. Shirley St., Suite 100

Tacoma, WA 98407

Fax: 253-752-7083

CHAIN OF CUSTODY RECORD

PROJECT NAME PROJ. NO AIR MONITORING POINT RUSTON, LLC (STACK HILL)
SAMPLERS. (Signature) CONTAINERS Santage Z REMARKS Р COMP GRAB SAMPLE NUMBER DATE STA# TIME Š 8-9-07 49Th 080907-181 080907-719 8-9-07 Comm 8-9-07 COURT 080907 - 333 8-10-07 49Th 081007-181 081007 - 719 8-10-07 (OURT 8-10-0 Comm 081007 - 333 Relinquished (Signature) Date/Time Received by: (Signature) Lab Shipped via: FedEx, UPS or Other : TIME 8/13/07 12:00 PM Air Bill # -Réceived by: (Signature) *Relinquished (Signature) Date/Time Remarks Relinquished (Signature) Date/Time Received for Laboratory by: (Signature) Date/Time Enclosed: Parameter List with DTLs Cover Letter Split Samples:]Accepted []Declined COCForm - 4/04 Signature

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09/05/2007

Point Ruston 5219 N. Shirley St., Suite 100 Tacoma, WA 98407

Project:

Air Monitoring/Stack Hill

Date Received:

08/22/2007

Spectra Project: 2007080338

Client ID	Spectra#	Δημίε	Result	Units	Method	<u> </u>	Date Sampled
081307-181	1	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/13/2007
081307-719	2	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/13/2007
081307-333	3	Arsenic	< 0.1	μg/m3 _.	SW846 7060A	Air Cassette	08/13/2007
081407-181	4	Arsenic	< 0.1	μg/m3	SW846 7060A	Air Cassette	08/14/2007
081407-719	5	Arsenic	< 0.1	μ <i>g</i> /m3	SW846 7060A	Air Casseπe	08/14/2007
081407-333	6	Arsenic	< 0.1	កឱ/យិ3	SW846 7060A	Air Cassette	08/14/2007
081507-181	. 7	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/15/2007
081507-333	8	Arsenic	< 0.1	μg/m3	SW846 7060A	Λir Cassette	08/1 <i>5/</i> 2007
051507-719	9	Arsenic	< 0.1	րջ/m3	SW846 7060A	Air Cassene	08/15/2007
081607-181	10	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/16/2007
081607-719	11	Arsenic	< 0.1	μ <u>σ</u> /m3	SW846 7060A	Air Cassette	08/16/2007
081607-333	12	Arsenic	< 0.1	μ <u>έ</u> /m3	SW846 7060A	Air Cassette	08/16/2007

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager

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POINT RUSTON

CHAIN OF CUSTODY RECORD

\$219 N. Shirtey St., Suite 100 Taooma, WA. 98407 Phone: 250-752-2185 Fax: 250-752-7080

PROJ. NO)		PRO	JEC	TNAME					7	7	7	7	7	7	7		
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8/14/07	49 Th				08140	7- 181			/									
8/14/07	COURT				08140	7- 719		١										
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8/15/07	49 Tk				08150	7- 181		1	1									
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Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-001

Client Sample ID: TSM0707430

Report Date: 08/28/07

Collection Date: 07/30/07 08:15

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL						
Arsenic	0,109	mg/L	0.00	5	E200.8	08/27/07 13:17 / sas
Copper	0.15	mg/L	0.01		E200.8	08/27/07 13:17 / sas
Zinc	0.03	mg/L	0.01		E200.8	08/27/07 13:17 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-002

Client Sample ID: TSM0707130

Report Date: 08/28/07

Collection Date: 07/30/07 08:45

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL				•			
Arsenic	0.040	mg/L		0.005		E200.8	08/27/07 13:52 / sas
Copper	, ND	mg/L		0.01		E200.8	08/27/07 13:52 / sas
Zinc	ND	mg/L	•	0.01		E200.8	08/27/07 13:52 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

Client Sample ID: TSM0807406

B07082225-003

Report Date: 08/28/07

Collection Date: 08/06/07 08:50

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL						
Arsenic	0.030	mg/L	0.005		E200.8	08/27/07 13:59 / sas
Copper	0.01	mg/L	0.01		E200.8	08/27/07 13:59 / sas
Zinc	ND	mg/L	0.01		E200.8	08/27/07 13:59 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-004

Client Sample ID: TSM0807106

Report Date: 08/28/07

Collection Date: 08/06/07 08:59 DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers F	₹L	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.028	mg/L	0.0	05		E200.8	08/27/07 14:06 / sas
Copper	ND	mg/L	0.	01		E200.8	08/27/07 14:06 / sas
Zinc	ND	mg/L	0.	01		E200.8	08/27/07 14:06 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring .

Lab ID:

B07082225-005

Client Sample ID: TSM0807413

Report Date: 08/28/07

Collection Date: 08/13/07 10:15

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RI	MCLA QCL		Analysis Date / By
METALS, TOTAL						
Arsenic	0.033	mg/L	0.00	5	E200.8	08/27/07 14:13 / sas
Copper .	0.02	mg/L	0.0	l	E200.8	08/27/07 14:13 / sas
Zinc	ND	mg/L	0.0	l	E200.8	08/27/07 14:13 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-006

Client Sample ID: TSM0807113

Report Date: 08/28/07

Collection Date: 08/13/07 10:40

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL						
Arsenic	0,033	mg/L	0.005		E200.8	08/27/07 14:35 / sas
Copper	ND	mg/L	0.01		E200.8	08/27/07 14:35 / sas
Zinc	ND	mg/L	0.01		E200.8	08/27/07 14:35 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-007

Client Sample ID: TSM0807420

Report Date: 08/28/07

Collection Date: 08/20/07 15:00

DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RL	MCL/ QCL Method	Analysis Date / By
METALS, TOTAL					
Arsenic	. 0.024	mg/L	0.005	E200.8	08/27/07 14:42 / sas
Copper	0.01	mg/L	0.01	E200.8	08/27/07 14:42 / sas
Zinc	ND	mg/L	0.01	E200.8	08/27/07 14:42 / sas

Client:

Point Ruston LLC

Project:

Tacoma Smelter Outfall Monitoring

Lab ID:

B07082225-008

Client Sample ID: TSM0807120

Report Date: 08/28/07

Collection Date: 08/20/07 15:15 DateReceived: 08/23/07

Analyses	Result	Units	Qualifiers RL	MCL/ QCL Method	Analysis Date / By
METALS, TOTAL					
Arsenic	0.035	mg/L	0.005	E200.8	08/27/07 14:48 / sas
Copper	ND	mg/L	0.01	E200.8	08/27/07 14:48 / sas
Zinc	ND	mg/L	0.01	E200.8	08/27/07 14:48 / sas